



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 10, 2021

David Swain
Agent - Strategic Resource Optimization Inc. (SRO)
Strategic Resource Optimization Inc. (SRO)
555 Alter Street, Unit 19B
Broomfield, CO 80020-1683

Subject: PRIA Label Amendment – Add Revised Efficacy Claims and Increase the Shelf Stability and Add a Refrigerated Stability Claim
Product Name: Electro-Biocide
EPA Registration Number: 87492-1
Received Date: April 20, 2021
Action Case Number: 00298678

Dear Mr. Swain:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6), you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jack Hall via email at hall.john.j@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "DF", with a horizontal line extending to the right.

Demson Fuller, Product Manager 32
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

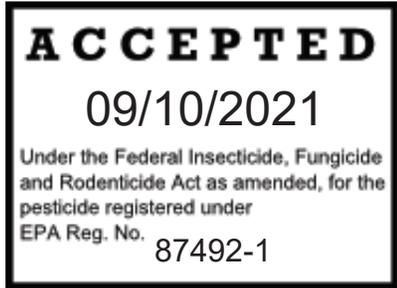
ELECTRO-BIOCIDE®

[Disinfectant]

[Deodorizer]

[Cleaner]

Kills †Viruses and Bacteria



ACTIVE INGREDIENT:	
Chlorine Dioxide.....	0.02%
OTHER INGREDIENTS	99.98%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 87492-1
EPA Est. No. 87492-CO-002

[Manufactured by:] Strategic Resource Optimization, Inc. EPA Reg. No. 87492-1
Net Contents: (16 fl. oz., 1 quart, 1 gallon, 5 gallons, 30 gallons, 55 gallons or 250 gallons)

Expiration Date: Thirty-five (35) days from date of manufacture at room temperature.
Refrigerated (2-4 °C) Expiration Date: One hundred fifty (150) days from date of manufacture.

[Distributed By: {enter sub-registrant}]
[Made in the USA by:]
SRO, Inc.
555 Alter St., Unit 19B
Broomfield, CO 80020-1683
Phone: 888-434-6943 (or 888-4-DIOXIDE)

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that: 1) is introduced directly into the human body, either into or in contact with the blood stream or normally sterile areas of the body, or 2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

Note: This product meets EPA’s Toxicity Category IV by all routes of exposure. Therefore, a signal word, precautionary language and first aid statement is not required in accordance

to EPA label review manual. Pre-treat a small, inconspicuous area of surface being disinfected for colorfastness.

Recommended Use at Locations:

ELECTRO-BIOCIDE® is a bactericidal and †virucidal disinfectant that disinfects pre-cleaned hard non-porous surfaces such as stainless steel, chrome, glass, plastic, vinyl, glazed porcelain, glazed ceramic, plastic laminate, sealed terrazzo or granite, linoleum, metal, and finished wood. Recommended for use in:

Hospitals	Schools
Nursing Homes	Universities
Health Care Settings	Gymnasiums
Hotels & Motels	Locker Rooms
Cruise Ships	Public Transportation
Dormitory Rooms	Restrooms
Temporary Housing	Households
Break Rooms	Fitness Centers
	Nurseries

Recommended Use on Surfaces:

ELECTRO-BIOCIDE, is rated Category IV and is an effective disinfectant. It is a bactericidal and †virucidal disinfectant on the following pre-cleaned hard non-porous surfaces such as stainless steel, chrome, glass, plastic, vinyl, glazed porcelain, glazed ceramic, plastic laminate, sealed terrazzo or granite, linoleum, metal, and finished wood when used as directed:

Call bell	Patient Equipment
Over bed tables	Restroom Fixtures
Side Tables and Desks	Trash Cans
Closets	Shelves
Televisions & Remotes	Drawers
Computers	Telephones
Floors	Walls

FOR USE AS A DISINFECTANT

Disinfectant: ELECTRO-BIOCIDE®, when used as directed, is effective with a 10 minute contact time on pre-cleaned hard non-porous inanimate surfaces in treating:

Pseudomonas aeruginosa [ATCC 15442]
 Staphylococcus aureus [ATCC 6538]
 Salmonella enterica [ATCC 10708]
 Staphylococcus aureus (MRSA) [ATCC 33592]
 Enterococcus faecalis (VRE) [ATCC 51575]

Disinfectant: ELECTRO-BIocide, when used as directed, is effective with a 1 minute contact time on pre-cleaned hard non-porous inanimate surfaces in treating:

Klebsiella pneumoniae [ATCC 4352]

[Multi-drug Resistant (MDR)] Acinetobacter baumannii [ATCC 19606]

TO DISINFECT:

- 1) Pre-clean all hard, non-porous surfaces with ELECTRO-BIocide or detergent prior to disinfection
- 2) Spray from 4-6 inches away all pre-cleaned, hard, non-porous surfaces until thoroughly wet
- 3) Allow treated surfaces to remain visibly wet for 10 minutes
- 4) Allow surfaces to air dry

FOR USE AS A VIRUCIDE

†**Virucidal:** ELECTRO-BIocide®, when used as directed in the Disinfectant Directions for Use, is effective with a 10 minute contact time on pre-cleaned hard non-porous inanimate surfaces in treating:

Rhinovirus Type 37 [ATCC VR-1147, Strain 151-1]

°Influenza Type A (H1N1) Virus [ATCC VR-1469, Strain A/PR/8/34]

Hepatitis A Virus [Strain HM-175]

Human Immunodeficiency Virus Type 1 (HIV-1) [Strain HTLV-IIIb]

DISINFECTING AGAINST THE FLU° VIRUS

This product when used as directed in the Disinfectant Directions for Use is effective against the Flu° Virus. Disinfection use directions include “pre-cleaning all hard, nonporous surface of visible soil prior to disinfection.”

DISINFECTING BABY FURNITURE AND HARD NON-POROUS TOYS OR- HARD, NON-POROUS KID’S TOYS

This product when used as directed in the Disinfectant Directions for Use is an effective disinfectant for baby furniture and hard, non-porous toys and hard non-porous kid’s toys. Disinfection use directions include “pre-cleaning all hard, nonporous surface of visible soil prior to disinfection.”

*KILLS HIV ON PRE-CLEANED ENVIRONMENTAL SURFACES/OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS in health care settings and other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood / body fluids, and in which the surfaces / objects likely to be soiled with blood / body fluids can be associated with the potential for transmission of Human Immunodeficiency Virus Type 1 [HIV-1] [associated with AIDS].

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST

HIV-1 [AIDS Virus] OF SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS. Personal Protection: Disposable latex or vinyl gloves, gowns, face masks, and eye coverings as appropriate, must be worn during all cleaning of body fluids, blood, and decontamination procedures. Cleaning Procedures: Blood / body fluids must be thoroughly cleaned from surfaces / objects before application of ELECTRO-BIOCIDE. Contact Time: Allow treated surfaces to remain visibly wet for 10 minutes to kill HIV-1. Use a 10 minute contact time for all other organisms claimed.

Disposal of Infectious Material: Blood / body fluids must be autoclaved and disposed of according to Federal, State, and local regulations for infectious waste disposal.

GENERAL CLEANING DIRECTIONS

This patented product is a cleaner and deodorizer when used as directed in the following cleaning and deodorizing Directions for Use.

Spray this product directly onto soils and wipe clean with a dry paper towel or lint-free cloth, sponge, mop or rag. Repeat as needed for visibly soiled areas.

TO CLEAN NON-POROUS AND/OR SOFT SURFACES:

Spray soiled area then wipe clean. For spot cleaning, spray and wipe/blot clean with damp sponge and/or mop and/or cloth.

TO CLEAN PROTEINS AND ORGANIC MATTER DERIVED FROM ORGANS INCLUDING MUSCLES, BRAIN, SPINAL CORD, TONSILS AND OTHER ORGANS OF CATTLE, SHEEP, DEER AND POULTRY:

Remove all animals and feeds from premises. Remove all litter, loose dirt, debris, droppings and manure from floors, walls and surfaces of facilities occupied or traversed by animals. Pre-clean visibly soiled items. Spray ELECTRO-BIOCIDE from 6-8 inches away from surface until thoroughly wet. Wipe with clean cloth or paper towel or rinse with potable water and air dry.

DEODORIZING DIRECTIONS

DEODORIZING OR TO ELIMINATE ODORS ON HARD SURFACES:

Use ELECTRO-BIOCIDE to clean and deodorize hard, non-porous surfaces. Spray surfaces until completely wet and let stand for 10 minutes. Then rinse and/or wipe dry with a clean cloth or paper towel, or allow to air dry. Repeat if necessary.

TO DEODORIZE DRAIN PIPES:

Pour 1 cup (8 oz.) of ELECTRO-BIOCIDE into drain. Wait 5 minutes; then flush out with clear water.

TO DEODORIZE DISHCLOTHS and/or SPONGES:

To control odors caused by bacteria in sponges and/or dishcloths, spray until saturated with ELECTRO-BIOCIDE and let stand for 10 minute. Rinse with potable water. Repeat if

necessary.

TO DEODORIZE HEATING, VENTILATION and AIR CONDITIONING (HVAC) SYSTEMS:

DIRECTIONS FOR USE: For Deodorization and Odor-Causing Bacteria Control in HVAC Systems and Air Ducts. TO DEODORIZE HVAC SYSTEM DUCTWORK: Spray ELECTRO-BIOCIDE into system intake vents while system fan is running. Allow enough spray time for ELECTRO-BIOCIDE to contact air duct system surfaces. Repeat application as necessary.

TO CONTROL POWDERY MILDEW ON PLANTS

ELECTRO-BIOCIDE can be applied by spray bottle held 4 to 8 inches from plant surface, or by use of a commercial sprayer. To effectively treat both the tops and bottoms of leaves, an electrostatic sprayer can be used. It is recommended to spray until all plant surfaces are visibly wet and remain wet for 3 minutes. Do not over-saturate plants.

STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

{Institutional Non-refillable Containers}

PESTICIDE STORAGE: Store this product in a cool, dry area, away from direct sunlight or heat. Always store pesticides in the original container. In case of leaking container, wrap product in secondary container and follow pesticide disposal instructions. In case of spill, contain and flush with water and dispose of waste on site.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Call your local solid waste disposal agency or 1-800-CLEANUP for disposal instructions.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Then offer for recycling if available or dispose in trash.

{Institutional Refillable Containers}

PESTICIDE STORAGE: Store this product in a cool, dry area, away from direct sunlight or heat. Always store pesticides in the original container. In case of leaking container, wrap product in secondary container and follow pesticide disposal instructions. In case of spill, contain and flush with water and dispose of waste on site.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Call your local solid waste disposal agency or 1-800-CLEANUP for disposal instructions.

CONTAINER HANDLING: Refillable container. This bottle can only be refilled with {insert product name} refill bottle. Use only the same product refill bottle. Do not reuse this bottle for any other purpose. Offer for recycling, if available. If not, discard in trash.

{Emerging Viral Pathogens}

{This product qualifies for emerging viral pathogen claims per the EPA's 'Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels' when used in accordance with the appropriate use directions indicated below.

The statements shall be made only through the following communications outlets: technical literature distributed exclusively to health care facilities, physicians, nurses and public health officials, "1-800" consumer information services, social media sites and company websites (non-label related). These statements shall not appear on marketed (final print) product labels.}

<i>For an emerging viral pathogen that is a/an...</i>	<i>...follow the directions for use for the following organisms on the label:</i>
Enveloped virus	Rhinovirus type 37 (ATCC VR-1147)
Large, non-enveloped virus	Rhinovirus type 37 (ATCC VR-1147)

Electro-Biocide has demonstrated effectiveness against viruses similar to {Insert name of emerging virus} on hard, non-porous surfaces. Therefore, Electro-Biocide can be used against {Insert name of emerging virus} when used in accordance with the directions for use against Rhinovirus type 37 (ATCC VR-1147) on hard, non-porous surfaces. Refer to the CDC -or- OIE website at {Insert pathogen-specific website address} for additional information.

{Insert name of illness/outbreak} is caused by {Insert name of emerging virus}. Electro-Biocide kills similar viruses and therefore can be used against {Insert name of emerging virus} when used in accordance with the directions for use against Rhinovirus type 37 (ATCC VR-1147) on hard, non-porous surfaces. Refer to the {CDC -or- OIE} website at {Insert pathogen-specific website address} for additional information.